

The Honorable Thomas S. Zilly



JUL 24 2001

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

MUIO TRAN, KIM-CUC NGUYEN, NHU  
HUU TRAN, a minor child, LOAN HUU  
TRAN, a minor child,

Plaintiffs,

v.

THE CITY OF SEATTLE, a local municipal  
corporation; PAUL SCHELL, mayor of the  
City of Seattle, GIL KERLIOWSKI, Police  
Chief of the City of Seattle, KIRK M.  
WALDORF, # 6311, ALVIN F. LITTLE, #  
4843; JOHN S. VRADENBURG, # 5853;  
NICHOLUS J. BAUER, # 5824, ROBERT E.  
WHITE, # 5484; ROBERTO V. SABAY, #  
5472; EUGENE FOSTER, # 5844;  
MICHAEL R. GRIFFIN, # 5875, DANIEL J.  
BESTE, # 3295; KENNETH E. HICKS, #  
4559; TRUNG H. NGUYEN, # 5999;  
ROBERT R. CIERLEY, # 6216; KATHLEEN  
A. GRAVES, # 6232; ARRON D.  
SAUSAMAN, # 6089; TODD C. HARRIS, #  
6221; JOHNEY STEVENS, # 5072, BRUCE  
A. WIND, # 3995, DOUGLAS A. KITTS, #  
4744, each individually and each in their  
official employment capacity as Seattle  
Police Officers,

Defendants

No C01-1081-Z

**NOTICE OF APPEARANCE OF  
DEFENDANTS CITY OF SEATTLE  
AND MAYOR PAUL SCHELL**

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NOTICE OF APPEARANCE OF DEFENDANTS CITY  
OF SEATTLE AND MAYOR PAUL SCHELL - 1

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CV 01-01081 #00000005

STAFFORD FREY COOPER  
Professional Corporation

ATTORNEYS

2500 RAINIER TOWER  
1301 FIFTH AVENUE  
SEATTLE, WASHINGTON 98101-2621  
TELEPHONE (206) 623-9900

ORIGINAL

1 TO: The Clerk of the Above-Entitled Court

2 AND TO: MUJO TRAN, KIM-CUC NGYUEN, NHU HUU TRAN and LOAN HUU TRAN,  
3 Plaintiffs

4 AND TO. SALAH A. KORNAS, Attorneys for Plaintiff

5 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that defendants City of  
6 Seattle and Mayor Paul Schell hereby appears in the above-entitled action without waiving the  
7 questions of:

- 8 1. Lack of jurisdiction over the subject matter;
- 9 2. Lack of jurisdiction over the person;
- 10 3. Improper venue;
- 11 4. Improper forum,
- 12 5. Failure to state a claim upon which relief may be granted, and
- 13 6 Failure to join a party under Rule 19

14 YOU ARE FURTHER NOTIFIED that all further papers and pleadings herein,  
15 excepting original process, shall be served upon the undersigned attorneys at the address  
16 stated below

17 DATED this 23rd day of July, 2001

18  
19 STAFFORD FREY COOPER

20  
21 By Heather Carr  
22 Anne M. Bremner, WSBA # 13269  
23 Heather L. Carr, WSBA # 29780  
24 Attorneys for Defendant  
25  
26

NOTICE OF APPEARANCE OF DEFENDANTS CITY  
OF SEATTLE AND MAYOR PAUL SCHELL - 2

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